

REMARKS

Claims 1-26 are pending in the application and stand rejected 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,721,827 to Logan et al. in view of U.S. Patent No. 6,269,336 to Ladd et al. It is submitted that at the very least, claim 1 is patentable distinct and non-obvious over the combination of Logan and Ladd.

In particular, the combination of Logan and Ladd clearly does not disclose or suggest a *hierarchical structured document* that includes a *mapping of content pages* that can be accessed from a server or a *mapping of logic of dialog services* that can be accessed from the server, much less *wherein the hierarchical document is processed by a client to activate the content pages or the logic of the dialog services within the hierarchical structured document so as to allow a user to directly access any one of the content pages or dialog services*, as essentially claimed in claim 1.

The Examiner's reliance on the teachings of Logan and Ladd to derive the invention of claim 1 is seemingly erroneous, as the subject matters of Logan and Ladd are unrelated and irrelevant with respect to the claimed inventions. In the first instance, as with the previous Office Action issued in this action, the Examiner's reliance on Logan remains unclear. The Examiner appears to rely on Logan as disclosing the claimed *hierarchical structured document* that includes a *mapping of content pages ... or mapping of logic of dialog services*, but there is no clear explanation or support for this position set forth in either this or the previous Office Action. In fact, despite Applicant specifically addressing this issue in the previously filed Amendment, the Examiner has offered no counter-response or clarification in the current Office Action respecting such issue.

Again, as previously explained, Logan discloses a playback unit (103) that receives program segments received from a host system and includes methods for navigating the program segments (see Abstract). Logan teaches the use of hyperlink jumps in a “current selections list” for user navigation of program segments during a playback session. However, the “current selections list” is clearly not a hierarchical structured document which allows a user to *directly access any one of the content pages or dialog services*. Indeed, Logan specifically teaches that when a hyperlink is directed to a program segment that is not present in a “current selections list”, the program segment is “not currently available” if such segment is not locally stored (see, Col. 29, line 62- Col. 30, line 7). In other words, program navigation is a local function that is applied only to currently downloaded program sequence file (see, e.g., Col. 7, lines 23-45).

Moreover, the teachings of Ladd as relied on by the Examiner are even more remote and irrelevant with respect to the claimed invention. In particular, the Examiner states that Ladd teaches (Col. 9, lines 1-10) “the allowance of the user to access the dialog service and content pages via a server”. It is unclear as to what relevancy, if any, this teaching has to “*wherein the client processes the at least one hierarchical document to activate the content pages or the logic of the dialog services within the at least one hierarchical document so as to allow the user to directly access any one of the content pages or dialog services*.”

In fact, in formulating the rejection, the Examiner has failed to address, or otherwise explain with any reasonable degree of specificity, how the combined teachings of Logan and Ladd disclose or suggest the claimed “hierarchical document”, much less the *hierarchical document being activated client-side to enable direct access to content or services of a web site*. As explained in Applicant’s specification, the claimed inventions allow user to shortcut

conversational navigation through, e.g., multiple content pages, dialog components, or NLU dialog forms of a given site to readily and directly access information of interest. The hierarchical document (or structure skeleton) provides information that allows a user to quickly browse through the site or available service without having to follow and listen to every possible page leading to the desired service or transaction. Neither Logan nor Ladd, singularly or in combination, teach or suggest methods that address the fundamental concepts and purposes of the claimed inventions.

As such, the obviousness rejections are believed to be legally deficient as a matter of fact and law. Indeed, claim 1 is not rendered obvious by the combination of Logan and Ladd. Moreover, without further elaboration, claims 2-26 are patentable and non-obvious over the combination of Logan and Ladd at least for the same reasons given for claim 1. Therefore, withdrawal of the claim rejections is requested.

Respectfully submitted,



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